

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OSCAR SANCHEZ, MARCUS WHITE,
TESMOND MCDONALD, MARCELO
PEREZ, ROGER MORRISON, KEITH
BAKER, PAUL WRIGHT, TERRY
MCNICKELS, JOSE MUNOZ, KIARA
YARBOROUGH, OLIVIA WASHINGTON,
and IDEARE BAILEY, *on their own and on
behalf of a class of similarly situated persons,*

Petitioners/Plaintiffs,

v.

DALLAS COUNTY SHERIFF MARIAN
BROWN, *in her official capacity*, and
DALLAS COUNTY, TEXAS,

Respondents/Defendants.

Civil Action No. 20-cv-832

**DEFENDANT'S NOTICE OF VIDEOTAPED
DEPOSITION OF SHERIFF MARIAN BROWN**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of **Sheriff Marian Brown on Thursday, October 22, 2020 at 10 a.m. CST** at the law offices of Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, TX 75201, or such other date and location at which the parties mutually agree, and continuing day to day thereafter, as necessary, until completed.

In light of the COVID-19 Pandemic, **this deposition will be conducted remotely** using either telephonic conference, video conference, or secure web-based technology that will allow for the real-time review of exhibits and testimony, such as Veritext or other equivalent or similar video teleconference services or platforms.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(3) of the Federal Rules of Civil Procedure, the deposing party intends to cause the proceedings to be recorded by

both videographic and stenographic methods, and also through the instant visual display of testimony, in accordance with all applicable law.

Dated: October 2, 2020

Respectfully submitted,

/s/ Andrea Woods
AMERICAN CIVIL
LIBERTIES FOUNDATION
Andrea Woods*
N.Y. Bar No. 5595509
Brandon Buskey*
125 Broad Street, 18th
Floor
New York, NY 10004
(212) 549-2528
Awoods@aclu.org

Henderson Hill*
N.C. Bar No. 18563
201 W. Main St. Suite 402
Durham, NC 27701
(919) 682-9563
hhill@aclu.org

/s/ Adam Safwat
WEIL, GOTSHAL &
MANGES LLP
Adam Safwat*
D.C. Bar No. 1024043
Sarah Choi*
D.C. Bar No. 1657764
2001 M Street NW,
Suite 600
Washington, D.C. 20036
(202) 682-7000
adam.safwat@weil.com
sarah.choi@weil.com

/s/ Brian Klosterboer
ACLU FOUNDATION OF TEXAS
Brian Klosterboer
Texas. Bar No. 24107833
Adriana Piñon*
Texas Bar No. 24089768
Andre Segura
Texas Bar No. 24107112
5225 Katy Fwy., Suite 350
Houston, TX 77007
Tel: (713) 942-8146
Fax: (346) 998-1577

/s/ Elizabeth Rossi
CIVIL RIGHTS CORPS
Elizabeth Rossi*
D.C. Bar No. 1500502
1601 Connecticut Ave NW,
Suite 800
Washington, D.C. 20009
(202) 894-6126
elizabeth@civilrightscorps.org

/s/ Barry Barnett
SUSMAN GODFREY L.L.P.
Barry Barnett
Texas Bar No. 01778700
8115 Preston Road, Suite 575
Dallas, TX 75225
(866) 754-1900
bbarnett@susmangodfrey.com

Michael Gervais*
N.Y. Bar No. 5122890
1900 Avenue of the Stars,
Suite 1400
Los Angeles, CA 90067
(310) 789-3100
mgervais@susmangodfrey.com

/s/ Alison Grinter
NEXT GENERATION ACTION
NETWORK
Alison Grinter
Texas Bar 24043476
Kim T. Cole
Texas Bar No. 24071024
1808 South Good Latimer
Expressway
Dallas, TX 75226
(214) 704-6400
agrinter@thengan.com
kcole@thengan.com

ATTORNEYS FOR PETITIONERS/PLAINTIFFS

**admitted pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via the Court's CM/ECG system on all counsel registered with that system, and via email, on October 2, 2020.

/s/ Sarah Choi
Sarah Choi